

EXHIBIT 95

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**STIPULATION AND AGREEMENT BETWEEN PLAINTIFFS AND DEFENDANT
UNIVERSITY OF NOTRE DAME DU LAC REGARDING DONOR-RELATED
ADMISSIONS AND THE 568 EXEMPTION**

Plaintiffs and Defendant University of Notre Dame du Lac (“Notre Dame”) stipulate and agrees as follows:

1. For each Academic Year from 2003 through 2022, Notre Dame in some instances admitted students based on factors which included the applicant’s family’s donation history and/or capacity for future donations (“donor-related admissions”).

2. Notre Dame will not for any purpose invoke or claim immunity during this litigation under the 568 Exemption. (See 15 U.S.C. § 1 note; Pub. L. No. 103-382, title V, § 568, 108 Stat. 3518, 4060 (1994)).

3. Plaintiffs agree that, as to Notre Dame, this stipulation and agreement resolves Plaintiffs’ Motion to Compel Defendants to Provide FERPA Notices Pursuant to this Court’s Order Regarding FERPA and the Production of Certain Documents and Information (Dkt. No. 443-1), and that Plaintiffs will not take any further discovery of Notre Dame as to donor-related admissions, including but not limited to the relief requested in that Motion.

4. Plaintiffs may use or introduce all discovery already obtained from Notre Dame for any purposes Plaintiffs choose, consistent with the Confidentiality Order in this case, including but not limited to introduction into evidence, and with witnesses, at trial. Likewise, nothing in this stipulation and agreement restricts Notre Dame from using any discovery it has provided for any purposes, consistent with this stipulation and the Confidentiality Order.

5. The stipulations and agreements set forth above do not foreclose Notre Dame from responding to any allegations or arguments that Plaintiffs make about Notre Dame’s donor-related admissions that go beyond the stipulations and agreements set forth above.

Dated: October 4, 2023

Respectfully Submitted,

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